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Mary Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, Second Floor
Boston, MASS 02110

RE: DTE 02-38, Distributed Generation – Comment of low-income weatherization and fuel assistance program network

Pursuant to Department notice dated August 11, 2006, this is the response of the low-income weatherization and fuel assistance program network to the Massachusetts Distributed Generation Collaborative 2006 Final Report (2006 DG Report), filed June 30, 2006. The network monitored the collaborative but was not actively involved in the drafting of the report. However, the network is generally supportive of the DG collaborative and, as part of a project funded by the Massachusetts Technology Collaborative (MTC), is installing DG technologies in low-income settings in order to learn more about economic, technical, and programmatic aspects of DG in the field.

As DG policy is developed by the Department, the network is particularly interested in the definition and equitable allocation of costs and benefits of DG. The network will therefore be interested in participating in policymaking proceedings at the Department, including further activities of the DG Collaborative and the following specific anticipated tasks listed at page 46 of the 2006 DG Report:

6. Undertake further work on potential [distribution system] deferral benefits, including holding Technical Design Workshops slated for later in 2006.
7. Explore the following areas of potential DG value: (a) impact of DG on constrained areas, (b) impact of DG on market prices, and (c) impact of DG on the environment.
9. Encourage opening of a docket to investigate if utilities can install and own DG as a distribution resource.
10. Using other initiatives, e.g. the EPRI/STAC project, begin discussion among stakeholders on a framework for equitably allocating the costs, impacts and benefits of DG in such a way as to appropriately capture the net benefits of DG.
11. Initiate a northeast regional-level effort to address opportunities and mechanisms for deployment of distributed energy resources.

The network looks forward to working with the Department, the MTC, and the Parties on these important DG issues.

Respectfully,